

REMARKS/ARGUMENTS

This reply is responsive to the Office Action dated November 10, 2010. Claims 1- 51 remain in the application. No claims were amended by this reply.

Interview

The Applicant thanks Examiner Abderrahim Merouan and Supervisory Examiner Andrew Wang for the opportunity to conduct a telephone interview on January 24, 2011 with the Applicant's representatives Timothy J. Sinnott and Stanley K. Khaing of Bereskin & Parr LLP to discuss the application and the cited prior art.

The discussion during the interview was limited to the latest office action as it applies to independent claim 1. In the previous office action, the Examiner objected to claim 1 under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 4,809,202 by Wolfram (hereinafter "Wolfram") in view of NPL Kevin Sahr *et al.* "Geodesic Discrete Global Grid Systems", Cartography and Geographic Information Science, Vol. 30, No. 2, April 2003, pp. 121-134 (hereinafter "Sahr").

The Examiner conceded in the Office Action (at page 3, para. 4) that Wolfram does not disclose uniquely identifying each cell of an aperture-three hexagon tessellation of cells with a sequential number including the identification of a parent cell, and how the relationship between the parent cells and child cells are defined by the rules as claimed. However, the Examiner asserted in the Office Action (at pg. 4) that the Sahr reference (at pg. 122) discloses these elements.

During the interview, the applicant submitted that the Sahr reference does not teach these elements. In particular, the applicant noted that while the Sahr reference provides a survey of various Geodesic Discrete Global Grid Systems ("GDGGS") (Sahr at Abstract), it does not teach how to represent these systems in a computer

data structure. On the contrary, Sahr stated on pg. 133 that "a significant effort must be made by the data structures community to develop and evaluate algorithms for the regular, but non-tree hierarchies they (hexagon-based GDDS) form". The applicant also noted that the definitions for the terms "incongruent" or "unaligned" provided in pg. 122 of the Sahr reference do not amount to disclosing defining parent-child relationship according the two rules as claimed and assigning hierarchical indexes based on that relationship, in contrary to the Examiner's assertion on pg. 14 at para. 49 of the Office Action.

Following the Applicant's submissions, the Examiners agreed that the Sahr reference does not teach all of the elements of the claimed invention. The Examiners further indicated that claim 1, as presented in the Applicant's previous response, is allowable over the cited references, and that a Notice of Allowance could be expected with the next office action, provided no additional prior art that is more relevant is located.

Further Submissions

The Applicant submits that claim 1 as presented in the pervious response to the office action is allowable over the prior art, for the above noted reasons, and also for the reasons as provided in the applicant's response to the previous office action submitted March 25, 2010, which are hereby incorporated by reference.

The Applicant submits that each of the remaining independent claims 7, 22, 36 also has the limitation of assigning a hierarchical index based on the two rules that define the parent-child relationship that is found in claim 1. As such, the applicant submits that these claims are allowable at least for the same reasons that claim 1 is allowable.

The remaining claims 2-6, 8-12, 13-21, 23-35, and 37-51 are directly or indirectly dependent on one of the independent claims 1, 7, 22, or 26. The Applicant submits

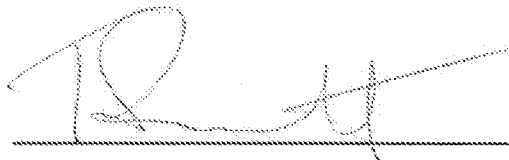
that these claims are allowable at least for the same reasons that the independent claims are allowable.

Conclusion

In view of the arguments and submissions presented in this reply and the interview, and the agreement reached by the Examiners during the interview, the Applicant submits that each of the claims 1 - 51 is now in condition for allowance.

The Applicant therefore respectfully solicits a Notice of Allowance.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read 'TJ Sinnott', is written over a horizontal line.

Timothy J. Sinnott

Registration No. 31,083

TJS/SKK

Bereskin & Parr LLP/S.E.N.C.R.L., s.r.l.

Box 401

40 King Street West

Toronto, Ontario

Canada M5H 3Y2

Telephone: (416) 957-1694

Fax: (416) 361-1398